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BY ECF

Hon. Victoria Reznik
United States District Court
300 Quarropas Street
White Plains, New York 10601

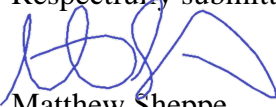
re: Millman, et al. v. Ethos Risk Services, LLC (24-CV-4370 (KMK)(VR)

Dear Judge Reznik:

We represent Plaintiffs Jeffrey Millman and Jennifer Millman (together, “Plaintiffs”) and write jointly along with Defendants Ethos Risk Services, LLC (“Ethos”), James A. Charles (“Dr. Charles”) and The Lincoln National Life Insurance Company d/b/a Lincoln Financial Group (“Lincoln” and together with Ethos and Dr. Charles, “Defendants”) pursuant to Your Honor’s April 1, 2025 Order (ECF Dkt. No. 84) to provide a status update on anticipated motion practice and ongoing discovery, which update follows.

First, with respect to the anticipated motion practice, Plaintiffs filed their Second Amended Complaint on April 10, 2025 (ECF Dkt. No. 88), adding MCN Emperion as a defendant. MCN Emperion has been served but has not entered an appearance yet. Once it does, the parties intend to meet and confer on a proposed briefing schedule on the anticipated motions to dismiss, after which it is anticipated that the Defendants will file pre-motion letters with Judge Karas, which will include the proposed briefing schedule.

Second, with respect to ongoing discovery, while Plaintiffs intend to pursue previously served discovery requests, at present there are no discovery disputes ripe for the Court’s intervention.

Respectfully submitted,

Matthew Sheppe

cc: Defendant’s counsel by ECF